

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA

VS.

NANCY ALMAGUER

§
§
§
§
§

CASE NUMBER: SA: 19:CR-00905-2-DAE

DEFENDANT'S MOTION FOR CONTINUANCE

TO THE HONORABLE UNITED STATES JUDGE OF SAID COURT:

Now comes NANCY ALMAGUER, Defendant, and files this Motion for Continuance and shows the Court as follows:

I.

Defendant hired counsel on December 26, 2019. Defendant has been indicted for Healthcare Kickbacks and conspiracy. Numerous documents, undercover video recordings, and Title III wire interceptions have been received recently as discovery. More discovery is expected. Review of this evidence will be lengthy and critical.

Plea agreements are due January 24, 2020 and trial will begin February 10, 2020.

II.

Defense counsel requests additional time to review the discovery in this case and explore all possible defenses. Defendant requests a continuance of sixty (60) day (s) for both the plea agreement due date and the trial setting.

III.

This motion is not made for the purposes of delay, but that justice may be done.

Respectfully submitted,

JOEY CONTRERAS
823 Hoefgen Ave.
San Antonio, Texas 78210
Telephone: (210) 212-9000
Facsimile: (210) 212-9242

/S/

JOEY CONTRERAS
State Bar No: 04712320
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above foregoing document has been delivered to the United States Attorney for the Western District of Texas, San Antonio Division, simultaneously with the filing of this request via the Clerk EFC filing system.

/S/
JOEY CONTRERAS

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA

VS.

NANCY ALMAGUER

§
§
§
§
§

CASE NUMBER: SA: 19:CR-00905-2-DAE

ORDER REGARDING DEFENDANT'S MOTION FOR CONTINUANCE

BE IT REMEMBERED, that on this day came to be considered the above and foregoing DEFENDANT'S MOTION FOR CONTINUANCE. After consideration of the same, it is the opinion of the Court that this motion be:

() GRANTED

() DENIED

Signed on _____

HON. DAVID A. EZRA
UNITED STATES DISTRICT
COURT JUDGE